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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

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IN RE: AETNA UCR LITIGATION

MDL NO. 2020

This Document Relates to: ALL CASES

MASTER DOCKET NO.
07-3541 (FSH)(PS)

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**PLAINTIFFS' SUBMISSION IN RESPONSE TO THE
COURT'S FEBRUARY 1, 2011 ORDER**

Plaintiffs respectfully submit the attached comparison of the Joint Consolidated Amended Complaint (Docket No. 219) and the Second Joint Consolidated Amended Complaint (Docket No. 319) in blackline form. In addition, we provide a brief listing of the substantive changes for the Court's convenience.

1. One named Provider Plaintiff, Valauri, was deleted from the Second Joint Consolidated Amended Complaint (hereinafter, "SAC").
2. The SAC adds certain language making it clearer that certain Provider Plaintiffs and Associations do not bring claims against United Healthcare Group ("UHG") or Ingenix. It also adds language relating to certain Plaintiffs who do assert claims against UHG or Ingenix in

addition to Plaintiff Weintraub. Accordingly, both the Aetna and UHG defendants are alleged to have engaged in antitrust violations (UHG as a Defendant rather than only as a co-conspirator), and in violations of RICO.

3. Subscriber Plaintiff Hull is added as a representative for the Subscriber ERISA Class. The SAC further clarifies that Subscriber Plaintiff Weintraub is not a class representative for the RICO section 664 class. The SAC also clarifies that Plaintiff Hull is not currently insured by Aetna and does not seek injunctive relief.

Dated: February 4, 2011

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